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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICIT OF NEVADA**

11 MARGARET MARTINEZ, individually
12 and on behalf of all others similarly
situated,

13 Plaintiff,

14 vs.

15 HOPE CREDIT, LLC,

16 Defendant.

Case No.: 2:23-cv-01003-BNW

**JOINT PROPOSED DISCOVERY
PLAN AND SCHEDULING ORDER**

**SPECIAL SCHEDULING
REQUESTED**

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1 Plaintiff MARGARET MARTINEZ (“Plaintiff”) and Defendant HOPE
2 CREDIT, LLC (“Defendant”) (jointly as the “Parties”), by and through their
3 respective counsel, hereby submit this proposed Joint Discovery Plan and Scheduling
4 Order.

5 **Special Scheduling Review is Requested** because the Parties believe extended
6 dates are necessary in this matter since this is a class action. Because the Parties are
7 seeking deadlines that deviate from those set forth in LR 26- 1(b), special review is
8 requested. Based on the Parties’ experience in other class actions, the Parties believe
9 the proposed discovery plan and schedule described below allows for the most
10 efficient resolution of the case, while accounting for the time it will reasonably take
11 to complete discovery and class certification briefing.

12 The Parties propose the following discovery plan and scheduling order:

13 **PROPOSED DISCOVERY PLAN**

14 1. **Discovery Cut-Off Date:** Defendant filed its Answer on July 26, 2023.
15 ECF No. 6. To allow for all discovery to take place, the proposed cut-off date for
16 discovery shall be **July 31, 2024**.

17 2. **Amending the Pleadings and Adding Parties:** All motions to amend
18 the pleadings or to add parties shall be filed no later than **February 2, 2024**.

19 3. **Fed.R.Civ.P. 26(a)(2) Disclosures (Experts):** Disclosures and reports
20 concerning experts shall be made by **April 2, 2024**. Disclosures and reports
21 concerning rebuttal experts shall be made by **May 2, 2024**.

22 4. **Class Certification:** The final date to file the motion for class
23 certification shall not be later than **May 2, 2024**.

24 5. **Dispositive Motions:** The date for filing dispositive motions shall not be
25 later than **August 30, 2024**, 30 days after the proposed close of discovery. In the
26 event that the discovery period is extended from the discovery cut-off date set forth in
27 this proposed Discovery Plan and Scheduling Order, the date for filing dispositive
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1 motions shall be extended to be not later than 30 days from the subsequent discovery
2 cut-off date.

3 6. **Pretrial Order**: The date for filing the joint pretrial order shall not be
4 later than **September 30, 2024**, 30 days after the cut-off date for filing dispositive
5 motions. In the event that dispositive motions are filed, the date for filing the joint
6 pretrial order shall be suspended until 30 days after decision on the dispositive
7 motions or until further order of the court. In the further event that the discovery
8 period is extended from the discovery cut-off date set forth in this Discovery Plan and
9 Scheduling Order, the date for filing the joint pretrial order shall be extended in
10 accordance with the time periods set forth in this paragraph.

11 7. **Pretrial Disclosures**: The disclosures required by Fed. R. Civ. P.
12 26(a)(3), and any objections thereto, shall be included in the joint pretrial order.

13 8.. **Extensions or Modifications of the Discovery Plan and Scheduling**
14 **Order**: Applications to extend any date set by the discovery plan, scheduling order,
15 or other order must comply with the Local Rules.

16 9. **Initial Disclosures**: The Parties shall make initial disclosures on or
17 before **September 15, 2023**, to the extent that initial disclosures have not yet been
18 made.

19 10. **Protective Order**: Plaintiff understands that Defendant desires a
20 stipulated protective order governing confidential information. Plaintiff requests a
21 stipulated protective order governing confidential information be filed by **October**
22 **16, 2023**, so as to not delay production of discovery.

23 11. **Electronic Service**: The Parties agree that electronic service of
24 discovery documents may be used.

25 12. **Alternative Dispute Resolution Certification**: The Parties certify that
26 they met and conferred about the possibility of using alternative dispute-resolution
27 processes including mediation, arbitration, and early neutral evaluation.
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1 The Parties are generally agreeable to the Alternative Dispute Resolution
2 through, including but not limited to, mediation and early neutral evaluation after an
3 initial period of discovery.

4 13. **Alternative Forms of Case Disposition Certification**: The Parties
5 certify that they considered consent to trial by a magistrate judge under 28 U.S.C. §
6 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order
7 2013-01). The parties have not reached any stipulations at this stage.

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1 14. **Electronic Evidence**: The Parties certify that they discussed the
2 possibility of producing documents in electronic format, which could then facilitate
3 presenting electronic evidence to jurors for the purposes of jury deliberations at trial.
4 The parties have not reached any stipulations at this stage.

5 DATED this 6th day of September 2023.

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7 **Kazerouni Law Group, APC**

8 By: /s/ Gustavo Ponce

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Consortium Corporation d/b/a Hope Credit LCC

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20 **SCHEDULING ORDER**

21 The above-set stipulated Discovery Plan of the Parties shall be the Scheduling
22 Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local
23 Rule 16-1.

24 IT IS SO ORDERED:

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26 UNITED STATES MAGISTRATE JUDGE

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28 DATED: September 7, 2023